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SAMHSA Volume 69, Number 71, Federal Register

Dr. Vogl,

I write this letter as a concerned citizen and as an Electrical / Mechanical Construction and Service Contractor performing work in Industrial, Commercial and Residential Construction.

Humphrey & Associates Inc. is a leader in our industry in quality, safety, community efforts, and customer satisfaction. Since 1977, our company has worked in the public sector and private sector, completing projects that vary from service calls at residences to 20+ million dollar construction contracts. We have been drug testing our employees for pre-employment procedures, random / for cause, and post accident scenarios since 1981. We have been using the Radio Immuno Assay Radioimmunoassay of Hair (RIAH) process for testing since 1989. Humphrey & Associates continues to use the Hair, Urine, and other testing methods, as they are appropriate for each situation. The drug testing is part of our system to provide a work environment free from recognized hazards.

I understand that there is concern that the use of Body Hair in the Hair Testing Process would be intrusive to an individual. Do to the common occurrence of balding and the fashionable aspect of shaving one's head once there is a void of hair on the head - Humphrey & Associates has used body hair in testing of employees. Although this was laughed at by some applicants, I believe that it was received as much less intrusive than having an "observed urine specimen." With the fashion conscious society and fear of male pattern baldness, I think that some applicants would rather offer body hair.

I believe that the issue of intrusion when collecting Body Hair for test purposes is an attempt to ignite potential problems as an effort to defray attention from the quality of the process. There is not a more effective and tamper resistant testing method available to our industry. Remember we are testing for the use of an "illegal substances."

Our culture has a severe illegal drug use problem. As you and your organization are aware, the drug use is related to many industry related economic problems including increased personal injuries, theft, loss of product, and most of all loss of life. I believe that an inquiry into the last several years of OSHA recordable fatalities would show a large percentage of the occurrences were coincidentally positive on autopsy drug screening.

I applaud the Federal Governments approach approving the use of Hair Testing and I encourage you to not water down the use of the screening by avoiding the recognition of body hair.

Please feel free to contact me if you have any questions.

Sincerely,
Humphrey & Associates Inc.

Randall P. Humphrey



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